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VIA CM/ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Amaro et al v. Unak Grocery Corp., et al.*, SDNY Case No.: 1:16-cv-7704

Dear Judge Broderick:

This office represents the Defendants, in the above-captioned case, as well as in the related case also pending before Your Honor, *Miranda, et al. v. Grace Farms, Inc., et al.*, Case No. 16-cv-1369. Pursuant to your Order, dated November 15, 2016 (DE #20), we submit this letter on behalf of Defendants regarding potential consolidation of the cases.

Defendants take no position on consolidation of the cases, and defer to the Court's determination of the most practical and expeditious manner of adjudicating the respective cases. We would note, only, that the first lawsuit filed, *Miranda*, is pleaded as a collective action, whereas the second is not. "Consolidation would ordinarily be the logical choice where, as here, multiple suits involving the same subject matter are pending in the same court." *Gordon v. Kaleida Health*, 2012 WL 171577, at *11 (W.D.N.Y. Jan. 17, 2012).

We thank the Court for your time and consideration in this matter.

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

By: Valerie K. Ferrier
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cc: Helen F. Dalton, Esq., Roman Avshalumov, Esq.
and James O'Donnell, Esq. (via ECF)